

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

KANAUTICA ZAYRE-BROWN,

Plaintiff,

v.

No. 3:22-cv-00191-MOC-DCK

THE NORTH CAROLINA
DEPARTMENT OF ADULT
CORRECTION, *et al.*,

Defendants.

JOINT STIPULATION OF DISMISSAL

All parties to the above-captioned action, acting through counsel and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), hereby dismiss the remaining claims in this action (Plaintiff's state constitutional *Corum* claim, Americans with Disabilities Act claim, and Rehabilitation Act claim) with prejudice. The parties further agree and stipulate that the court retains jurisdiction to resolve any motion for attorneys' fees and costs with respect to the Eighth Amendment claim,¹ on the timeline set forth in Doc. 151.

Respectfully submitted this the 20th day of June, 2025.

¹ In so stipulating, Defendants do not concede or stipulate to Plaintiff's claim of prevailing-party status for purposes of any fee award and reserve the right to dispute prevailing-party status and otherwise contest the motion for fees.

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CERTIFICATE OF SERVICE

I certify that on June 20, 2025, I electronically filed the foregoing document using the ECF system which will send notification of such filing to all counsel of record.

/s/ Jaclyn A. Maffetore
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Counsel for Plaintiff